

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

AARON SIEGEL;

JASON COOK;

JOSEPH DELUCA;

NICOLE CUOZZO;

TIMOTHY VARGA;

CHRISTOPHER STAMOS;

KIM HENRY; *and*

ASSOCIATION OF NEW JERSEY  
RIFLE & PISTOL CLUBS, INC.,

*Plaintiffs,*

v.

MATTHEW PLATKIN, in his official  
capacity as Attorney General of New  
Jersey,

PATRICK J. CALLAHAN, in his  
official capacity as Superintendent of the  
New Jersey Division of State Police,

*Defendants.*

Civil Action No. 1:22-cv-07463-  
KMW-AMD

**CIVIL ACTION**

**(ELECTRONICALLY FILED)**

**DECLARATION OF SCOTT L. BACH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

1. I, Scott L. Bach, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge.

2. I am Executive Director and a Regional Vice President of the Association of New Jersey Rifle & Pistol Clubs, Inc. (ANJRPC), a plaintiff in the above-titled action. I am over the age of 18. I am authorized to speak and testify on behalf of the ANJRPC as to the matters set forth in this Declaration.

3. I have personal knowledge of the matters set forth herein.

4. ANJRPC is a nonprofit membership corporation, incorporated in the State of New Jersey in 1936, which represents its members. Its mailing address is 5 Sicomac Road, Suite 292, North Haledon, New Jersey 07508.

5. ANJRPC represents the interests of target shooters, hunters, competitors, outdoors people, and other law-abiding firearms owners. Among ANJRPC's purposes is aiding such persons in every way within its power and supporting and defending the people's right to keep and bear arms, including the right of its members and the public to carry handguns in public for self-defense.

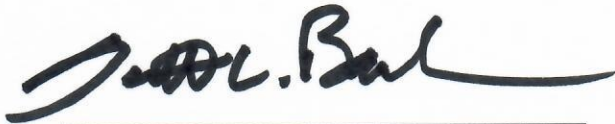
6. New Jersey's new law prohibiting handgun carry nearly everywhere in the State is thus a direct affront to ANJRPC's central mission. ANJRPC has many thousands of members who reside in New Jersey. ANJRPC brings the claim herein on behalf of its members.

7. ANJRPC has members, including Plaintiffs Siegel, Cook, DeLuca, Cuzzo, Varga, Stamos, and Henry who have indicated that they possess or have applied or will apply and qualify for Handgun Carry Permits and who wish to carry their handguns—and but for the provisions set forth above, would carry their handguns in public.

8. ANJRPC has members, including Plaintiffs Siegel, Cook, and Henry who have indicated that they imminently intend to apply for an FID and/or one or more Purchase Permits and in doing so will be subject to the unconstitutional provisions of N.J.S. 2C:58-3.

I declare under penalty of perjury that the foregoing is true and correct.

Executed within the United States.



Scott L. Bach



Date